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November 13, 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Room 822
Washington, D.C. 20554

Re: MM Docket 93-48
Children's Television
Proceeding

Dear Chairman Hundt:

We are writing to express our support for the proposals concerning a national strategy to strengthen the educational role of commercial television as a basic resource for the children of our nation, advanced in your address of October 18, 1995 to the Center of Media Education.

As scientific investigators for more than twenty five years of the role television plays in family life and childhood education we believe that the television industry could become a tremendous national resource if an independent non-governmental board and resource center were established to provide guidance to industry, parents and to appropriate government agencies. Such an organization could become a continuing resource for network, cable and local stations concerning the definitions of educationally-oriented and entertainment programming. It could, in addition, provide advisory consultation to producers and executives interested in strengthening their educational contributions. Such an organization could on the one hand (through publicizing its reviews of current programming) provide the public and relevant governmental commissions with clear evidence of industry groups that are meeting their public interest and educational responsibilities and on the other hand call attention to those industry units not meeting their obligations to the child audience. As an independent organization funded by industry and possibly also by private non-profit foundations it would dramatically reduce the likelihood of FCC or other governmental regulations and "micromanagement" of the communications industry.

Could such an independent board and resource center be feasible?
How would it be staffed? What financial outlay would be necessary?

We believe that there are by now enough research settings at major universities that have built up experience in evaluating the educational and

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entertainment value of new and established children's programming so that leadership for such an organization could easily be recruited with only modest costs. We believe we could name two dozen respected investigators from whom Board members could be recruited. In addition we would propose that the group's larger leadership include industry representatives (child programming executives, established children's programming producers). Educators reflecting national leadership in groups like the National Association of Early Childhood Education or various elementary and high school associations could participate. Groups like the National Education Goals Commission, the Carnegie Foundation for the Advancement of Teaching could provide possible participants who reflect the urgent educational needs that television or related services might fill as supplements to our school systems.

How might such an organization proceed?

A first step would be to establish sets of definitions and lists of areas of educational needs which are critical for school readiness in early childhood, for enhancing literacy and basic knowledge of history, arithmetic, civics, arts, and humanities in elementary school children and finally in supporting the more technical mastery of science, cultural, language arts and vocational preparatory skills at the high school level. Television could play a key role not only by combining educational activities of the sort mentioned with entertaining and motivating programming but also by establishing a positive, constructive aura around the educational process.

With definitions which research has shown to be feasible in evaluating early childhood and middle school programming, the organization could provide advisory ratings for current or projected children's programming to the industry and the public. Panels of professionally trained reviewers could be employed appropriately as in current research and, where feasible or suitably funded, studies of children's response to materials could be conducted.

As a resource center the proposed agency could also put appropriate industry representatives (executives or producers and writers) in touch with researchers or educators reflecting the established education/educational goals who could provide consultations and suggestions in formative phases of children's programming development. This would increase the likelihood that new programming in the child area could meet reasonable standards of serving at least some features of the educational goals without impeding the creative entertainment possibilities of the new material.

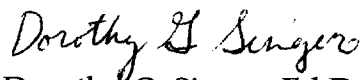
We do not believe it is our role to specify a specific number of hours of programming per week. We do know that youngsters watch between 3-6 hours of television daily, much of it adult and non-educational fare. The

objective would be to insure that local stations and networks (cable and broadcast) offer sufficient alternatives to children on a daily basis. We would also propose that an important educational contribution for television could be met by specific programming or TV spots directed at parents--enhancing literacy and parenting skills and providing motivation for supporting their children's educational goals. Such spots or programming could also be assessed by the independent commission and added to the public service contribution of a station or network.

What would an independent commission cost the industry? We believe that with much of the research carried out at University settings and with the sophisticated use of electronic mail costs could be minimal except for continuing central office staff, mailing and report preparation costs. Only occasional personal meetings of the Board would be required. Probably costs of about two hundred thousand or perhaps a quarter of a million per year (divided by a large number of industry contributors) could suffice. Specific costs for assessing new programming could be borne by individual producers or by private foundations.

In conclusion, we believe strongly that the television and broader communications industry could gain greatly by establishing an independent commission or board of this type. We want to encourage you and the FCC Commissioners to recommend such a plan. We stand ready to lend our aid in developing this proposal.

Sincerely,



Dorothy G. Singer, Ed.D.
Research Scientist



Jerome L. Singer, Ph.D.
Professor of Psychology

Co-Directors
Yale University Family Television
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